

COLANTONI
COLLINS
MARREN
PHILLIPS
& TULK, LLP

RECEIVED
OCT 03 2019
Pacific Workers'

201 Spear Street, Suite 1100
San Francisco, CA 94105
PHONE: 855-396-1220
FAX: 415-278-9744

WRITER'S EMAIL:
jgoines@ccmpt.com

WWW.CCMPT.COM

ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

September 20, 2019

Ms. Iana Zadneprovskaya
Farber & Company
333 Hegenberger Road, Suite 504
Oakland, CA 94621

Re: **Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC**

WCAB No: ADJ12031731
Claim No: 040519008736

Dear Ms. Zadneprovskaya:

As you know, you obtained a replacement PQME list panel number 2458351 dated September 11, 2019.

At this time, please allow defendants to confirm their strike of **Dr. Albert Retodo, MD**. That strike was made by email to Zachary Keweller of your office on September 18, 2019 however as noted in that email I am confirming it as noted within this letter. You struck Dr. Stuart Rubin.

That leaves the parties with Dr. Arzhang Zereshki and your office will set that examination.

Please also proceed to set the examination and then serve my office with notice given us a reasonable amount of time to draft a reasonable advocacy letter. If we do not receive notice that gives defendants a reasonable amount of time to draft our advocacy letter, I will object to the exam moving forward.

Thank you for your attention in this matter.

Kindest Regards,
COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:


JAMES J. GOINES

JJG/tg

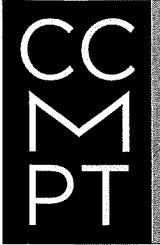
Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

September 20, 2019

Page 2

cc: Mr. Mario Castro (via email)
Chubb Group of Insurance Companies
PO Box 42065
Phoenix, AZ 85080

wcclaims2@chubb.com (via email)



COLANTONI
COLLINS
MARREN
PHILLIPS
& TULK, LLP

201 Spear Street, Suite 1100
San Francisco, CA 94105
PHONE: 855-396-1220
FAX: 415-278-9744
WRITER'S EMAIL:
jgoines@ccmpt.com

WWW.CCMPT.COM

ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

September 20, 2019

Dr. Arzhang Zereshki, MD
1335 Stanford Avenue
Emeryville, California 94608

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC
WCAB No: ADJ12031731
Claim No: 040519008736

Dear Dr. Zereshki:

Please note the parties obtained a replacement PQME list dated September 11, 2019 with panel number 2458351, and the parties went through the strike process. You are the remaining physician.

Applicant's attorney will contact you to set that examination. Please note that if defendants do not receive notice within an adequate amount of time to draft our advocacy letter, we will object to the exam moving forward, because both parties should be allowed a reasonable amount of time to draft those advocacy letters and then serve the same on the other parties.

Thank you kindly for your attention to this matter Dr. Zereshki, and the parties look forward to your reporting.

Kindest Regards,
COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:


JAMES J. GOINES

JJG/tg

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

September 20, 2019

Page 2

cc: Ms. Iana Zadneprovskia
Farber & Company
333 Hegenberger Road, Suite 504
Oakland, CA 94621

Mr. Mario Castro (via email)
Chubb Group of Insurance Companies
PO Box 42065
Phoenix, AZ 85080

wcclaims2@chubb.com (via email)